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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

December 21, 2001

Colonel Leonard D. Waterworth
Commander and District Engineer
U.S. Army Corps of Engineers
Galveston District
P.O. Box 1229
Galveston, TX 77553-1229

Re: Shoal Point Container Terminal – General Conformity/State Implementation Plan (SIP)
Construction Emissions Inventory

Dear Colonel Waterworth:

This letter is in response to a request for emissions inventory information to assist in the analysis of the air quality impacts from the proposed construction of the Shoal Point Container Terminal in Texas City. If, as expected, construction activity at the Shoal Point Container Terminal project generates emissions above the de minimis level of 25 tons per year of nitrogen oxides (NO_x) which is applicable in the Houston area, then a general conformity determination for the project must be performed by the Army Corps of Engineers, as required by the federal Clean Air Act Amendments of 1990.

The construction inventory is a subcategory of the broader category of "area and non road sources" contained in the applicable SIP. Estimates of construction emissions are based on a number of assumptions about population growth, economic activity, the phase in of Tier I and Tier II engines, and cleaner fuels, to name a few, rather than empirically based with the benefit of perfect knowledge about all the possible contributors of nitrogen oxides in the Houston area.

The 2000 SIP for the Houston/Galveston nonattainment, approved in October 2001, includes a construction inventory of 5.5 tons per day or 1,512.2 tons per year for volatile organic compound and 32.1 tons per day or 8,827.5 tons per year for NO_x. This inventory is based in part on the assumption that the most technologically advanced equipment (that is to say the cleanest) available would be in wide spread use. Therefore, any analysis must at least demonstrate it is consistent with this assumption.

Colonel Waterworth

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Please let Bruce Uphaus of my staff know if you need anything further from us on this matter. He can be reached at (512) 239-4528.

Sincerely,



Jeffrey A. Saitas, P.E., Executive Director
Texas Natural Resource Conservation Commission.

cc: Ms. Sharon Tirpak, U.S. Army Corps of Engineers, Galveston District
Mr. Jahanbakhsh Behnam, U.S. Environmental Protection Agency Region 6
Mr. Ruben I. Velasquez, P.E., Post, Buckley, Schuh & Jernigan